

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

LAURA MAY,)	
)	
Plaintiff,)	
)	
v.)	No. <u>08-758-GPM</u>
)	
SAINT LOUIS UNIVERSITY)	
HOSPITAL, a corporation,)	
)	
Defendant.)	

JURISDICTION

Jurisdiction lies pursuant to 28 U.S.C. 1332 - - Diversity of Citizenship.

COMPLAINT

COUNT I

(Negligence v. St. Louis University)

Comes now the plaintiff, LAURA MAY, by and through her attorney, **THOMAS Q. KEEFE, JR., P.C.**, and for Count I of her Complaint against the defendant, St. Louis University Hospital, states:

1. That on or about April 2008, and at all times herein mentioned, the defendant, Saint Louis University Hospital, was a corporation, authorized and doing business in the State of Missouri, when they, by and through their agents, servants and employees assumed the care of plaintiff, Laura May.

2. That on or about April 2008, and at all times herein mentioned, the plaintiff, Laura May, was a citizen and resident of Madison County, Illinois when she presented to the defendant

Saint Louis University for an endoscopic procedure to evaluate her adenoids.

3. That the defendant, individually, and by and through its agents, servants, and employees, was guilty of one or more of the following negligent acts or omissions:

- a) Negligently and carelessly administered an acid, Phenol, by inhalation instead of a local anesthetic in preparation for an endoscopic procedure.

4. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions on the part of the defendant as aforesaid, plaintiff has suffered permanent pain, extreme mental anguish, disability, and disfigurement. She has incurred and become liable for large sums of money in hospital, medical, and related expenses, all to her damage in a substantial amount.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

/s/Thomas Q. Keefe, Jr.
THOMAS Q. KEEFE, JR.
Ill. Reg. No. 03123418
Attorney for Plaintiff

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